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September 14, 2022

Via ECF

Hon. Ronnie Abrams
United States District Judge
Southern District of New York
Thurgood Marshall United States Courthouse
40 Foley Square
New York, N.Y. 10007

Mr. Abraham's bail conditions are modified to include travel to the NDNY and the Districts of Connecticut and Pennsylvania.

SO ORDERED.



Ronnie Abrams, U.S.D.J.
September 16, 2022

Re: *United States v. Shmuel Abraham*, 20-cr-411-RA

Dear Judge Abrams:

We write to respectfully request a modification of Shmuel Abraham's bond conditions, so as to allow him to travel within the continental United States without first seeking permission from the Court.

Under the terms of Mr. Abraham's current bail conditions, he may travel within SDNY, EDNY, WDNY, and the District of New Jersey. Dkt. #17; Minute Entry for 8/26/2020.

As Your Honor is aware, Mr. Abraham has been out on bail for over two years without incident. Under the terms of the Bail Reform Act, a defendant is to be released "subject to the least restrictive further condition, or combination of conditions, that such judicial officer determines will reasonably assure the appearance of the person as required and the safety of any other person and the community[.] 18 U.S.C. §3142(C)(1)(b). In other words, a defendant's constitutional right to travel may only be restricted if doing so is necessary to either assure the court that the defendant will appear for trial or to protect the community. We respectfully submit that the defendant's conduct over the last two years definitively shows that neither of these concerns is applicable to Mr. Abraham. The Court should therefore allow him to travel within the continental United States without restrictions. We note that Mr. Abraham has, as a condition of his bail, surrendered his passport and the Court can thus be assured that he will not leave the country without prior permission from the Court.

I spoke to AUSA Kamal about this request and she objected to the request to allow Mr. Abraham to travel within the continental United States, but consented to his travel to NDNY, and the Districts of Connecticut and Pennsylvania, to where Mr. Abraham would like to be able to travel for his new siding and roofing job.

[Document title]

I also spoke to Mr. Abraham's pre-trial officer and he took no position on this request.

We therefore respectfully request that the Court grant Mr. Abraham permission to travel within the continental United States or, in the alternative, to the NDNY and the Districts of Connecticut and Pennsylvania.

Respectfully submitted,

/s/

Gedalia M. Stern

Cc: AUSA Jilan Kamal